

56575-15

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 24 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Andrew Bronson
Regulatory Affairs Manager
Tender Corporation
106 Burndy Road
Littleton, NH 03561

Subject: Product Name: Natrapel 8 hour Insect Repellent
EPA Reg. No. 56575-15
Submission date: January 8, 2014
Amendment: Label Notification to Include TSA Acceptable Sizes

Dear Registrant:

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is unconditionally acceptable under 3(c)(5).

One copy of the labels stamped "Accepted" is enclosed for your records. Please submit one copy of the final printed labels before the product is released for shipment.

If you have questions concerning this letter, please call Owen Beeder at 703-308-8899 or via e-mail at beeder.owen@epa.gov or you may call me at 703-305-6701.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 56575-15	2. EPA Product Manager	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Natranel 8 hour Insect Repellent	PM#	
5. Name and Address of Applicant (Include ZIP Code) Tender Corporation 106 Burndy Road Littleton, NH 03561 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 39967-53 Product Name KBR 3023 All Family	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label Change to include TSA acceptable sizes.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input checked="" type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 0.5 to 6.0 oz		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product Shrink Sleeve & peelback		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Andrew Bronson	Title Regulatory Affairs MGR	Telephone No. (Include Area Code) 603-637-0225
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title Regulatory Affairs Manager	
4. Typed Name Andrew Bronson	5. Date 1/8/2014	

January 8, 2014

Richard Gebken, PM Team 10
EPA Registration Division
Office of Pollution Prevention & Toxics
1200 Pennsylvania Avenue, NW
Mail Code 7401-M
Washington, DC 20460

Subject: Natrapel 8 hour Insect Repellent
EPA Registration No. 56575-15
Notification dated January 9, 2014

Dear Mr. Gebken:

Enclosed is our completed Form 8570-1 seeking label changes allowable as a Notification for the above referenced registered product. The proposed Label changes are included as a redline draft copy which highlights the changes as well as ~~one~~ ^{two} (2) copies of the clean label.

The primary changes are to include marketing text for sizes that are 3.4 ounces or smaller indicating that they are appropriate for airline travel and to correct grammatical and spelling errors. A sample of the **3.4 ounce draft Container Label** (front and back) is enclosed.

Hoping that the context will assist you, I have enclosed the **Front Panel Card** and **Back Panel Card**. This is the card used with the "blister packaging" of our lotion and pump spray products. This is used in such a way that the approved front panel of the product container is visible through clear plastic which attaches to the front of a card and which has the complete approved text (as shown) on the back of the card. Furthermore, **the 3.4 oz and smaller draft front and Peel Back Panels is also affixed** to the immediate product packaging.

We are introducing smaller packaging. Some of these require that the back panel labeling be put on a "peel back" label. However, we would like to offer a ½ ounce package where the peel back option is not currently available. I have enclosed a draft to illustrate an abbreviated inner packaging label that refers the user to the outer packaging. The **draft 0.5 oz label** is also enclosed and it is representative of how the proposed changes will look after they are accepted. To be clear, the very small packaging will *always be sold with a complete approved back panel label formatted as the "existing back panel"* enclosed.

TENDER CORPORATION

Littleton, NH 03561 USA
603-444-5464 • 800-258-4696 • FAX 603-444-6735
www.tendercorp.com

"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Your attention to this matter is most appreciated. If you should have any questions, please call or email as indicated below.

Thank you,

Andrew Bronson

Tender Corporation
Littleton, NH USA 03561

Andrew G. Bronson
Regulatory Affairs Manager

(603) 837-0225 voice
(603) 259-7325 fax
abronson@tendercorp.com email

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{Front Panel Container Labels and Cards}

Natrapel 8 hour

[INSECT REPELLENT] {or}

[Tick and Insect Repellent]

{if applicable}[Child -Resistant Packaging]

[Continuous Spray]

[Long-Lasting Effective Mosquito Protection]

Active Ingredient:	Picaridin	20%
Inert Ingredients:		80%
		Total 100%

[Repels Insects That May Carry West Nile Virus [And] [&] Lyme Disease]
[Up to 8 Hours Protection] {or}[Up to 12 Hours of Protection]

[[EFFECTIVELY REPELS] Ticks and Mosquitoes for up to 12 Hours]
[[EFFECTIVELY REPELS] Biting flies, stable flies, black flies, gnats, chiggers; & sand flies.]

[Long-lasting, 12 hour effective protection from mosquitoes and ticks including mosquitoes carrying West Nile Virus.]

Keep Out of Reach of Children

CAUTION: Stop and read this entire label before use.

[See [card] [behind peel back] for additional precautionary statements.]

Net Contents: [] fluid oz. [] ml
[Lotion] {or} {Pump Spray}{or}[Continuous Spray]

NOTIFICATION
= 1 =

{Back Panel Container Labels and Cards and Peel Backs}

PRECAUTIONARY STATEMENTS

Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco.

FIRST AID

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after five minutes, and then continue rinsing.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a physician or poison control center immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by Poison Control Center or doctor.
- Do not give anything to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-858-7378 for emergency medical information.

{Note: The First Aid statements' grid format will be used if market label space permits: otherwise a paragraph format will be used}

STORAGE & DISPOSAL

Store in a cool, dry place out of the reach of children. Keep away from heat, sparks and open flame.

IF EMPTY: Do not reuse this container. Place in trash or offer for recycling if available.

FLAMMABLE IF PARTLY FILLED: Call your local solid waste agency or 1-800-526-9377 for disposal instructions. Never place unused product down any indoor or outdoor drain. bursting.]. Do not smoke while applying.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read and follow all directions and precautions on [this product label]

{or} all labels and packaging {where size requires peel-back }.

[Remove protective cap.] Hold 4 to 6 inches from skin while spraying keeping nozzle pointed away from face. Slightly moisten with a slow sweeping motion To apply to face, spray on hands and rub on. Apply sparingly around ears.. Do not apply to the hands of small children. Do not exceed two applications per day. Avoid contact with lips, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin.. Do not apply under clothing.

EPA Reg. No. 56575-15

EPA Est. 56575-NH-1

[Batch Lot No.:]

TENDER CORPORATION

[106 Burndy Road]

Littleton, NH 03561

{Very Small Packaging: When size does not allow a peel back, product will always be sold attached to a card with the complete "back panel" labeling from above and these very small sizes will have the following on the immediate packaging---Please see Draft Label enclosed as representative of the "very small packaging"}

Natrapel 8 hour

[INSECT REPELLENT] {or}
[Tick and Insect Repellent]

Active Ingredient:	Picaridin	20%
Inert Ingredients:		80%
		Total 100%

Keep Out of Reach of Children
**CAUTION: Stop and read all information on card for additional important
precautionary statements before use.**

Net Contents: [] fluid oz. [] ml [Lotion] {or} {Pump Spray}

Tender Corporation, Littleton, NH 03561

Questions? Call 1-888-258-4696 ext 236

EPA Reg. NO 56575-15

EPA Est. 56575-NH-1

[Batch Lot No.:]

PRECAUTIONARY STATEMENTS

Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes. Wash thoroughly with soap and water after: handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco.

FIRST AID: IF IN EYES: • Hold eye open and rinse gently with water for 15-20 minutes • Remove contact lenses, if present, after five minutes, and then continue rinsing. • Call a poison control center or doctor for treatment advice. **IF SWALLOWED:** • Call a physician or poison control center immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by Poison Control Center or doctor. • Do not give anything to an unconscious person. Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-858-7378 for emergency medical information.

STORAGE & DISPOSAL Store in a cool, dry place. Keep away from heat, sparks and flames. **IF EMPTY:** Do not reuse this container. Place in trash or offer for recycling. **IF PARTLY FILLED:** Call your local solid waste agency or 1-800-526-9377 for disposal instructions. *Never place unused product down any indoor or outdoor drain.*

DIRECTIONS FOR USE It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on all labels and all packaging. [Remove protective cap.] [(Spray delivery) Hold 4 inches from skin while spraying keeping nozzle pointed away from face slightly moisten area with a slow sweeping motion. Do not spray directly on face, spray on hands first and then rub on face.] Apply sparingly around ears. Do not apply to the hands of small children. Do not exceed two applications per day. Avoid contact with lips, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin. Do not apply under clothing.

{Everything below is Optional Selling Copy and according to container size and type}
1. New (claim would be valid for 6 months from date of the first product shipment with new packaging)
2. This Eco-Spray® Bottle uses a patented mechanical delivery system to create a continuous spray held in any position.
3. Continuous Spray
4. No Rubbing required
5. One Touch Pump
6. Easy Application
7. No Mess
8. Convenient; no mess, no rub protection
9. Sprays Upside Down

- Level {for packages with clear indicator of amount remaining}
 - Running Low {for packages with clear indicator of amount remaining}
 - Now with Twist Close Cap!
 - Airplane carry-on size
 - Maximum carry-on size
 - TSA [approved] travel size
 - TSA [approved] carry-on size
 - Convenient Travel Size
 - Convenient Airplane Travel Size
 - Airplane carry-on
 - [Approved] [for] Airplane[s] [Travel] [Size]
 - Approved Airplane Size
 - Airplane Size
 - Carry-on Size
 - Max carry-on size
 - Maximum [Max] Airplane [Travel] Size
 - For comfortable outing with the family. Protects against ticks, mosquitoes and [most] [all] types of biting insect.
 - For up to 12 hours of protection.
 - Full Strength repellent for maximum protection against ticks and [most] [all] types of biting insects
 - Use with confidence on the whole family
 - And your family will want to use it, too
 - Not oily, greasy or sticky
 - Does not damage plastic
 - Won't Damage Fishing Lines, Plastics or other Synthetic Materials
 - Unscented
 - 8 hours worry-free protection
 - Pocket Size
 - Notice: Buyer assumes all responsibility for safety and use not in accordance with directions
 - Repels [mosquitoes] [ticks] [mosquitoes and ticks] for up to 12 hours
- { Denotes Language that does not appear on market labeling }**